

# **EXHIBIT D**

**From:** Zahralddin, Rafael <Rafael.Zahralddin@lewisbrisbois.com>

**Sent:** Friday, August 04, 2023 9:44 PM EDT

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**Subject:** Zahralddin, Rafael has shared a document with you : motion to withdraw the reference order brief and certificate of service.docx (49.6 KB)

**Attachment(s):** "motion to withdraw the reference order brief and certificate of service(127777894.1).docx.nrl","motion to withdraw the reference order brief and certificate of service(127777894.1).docx"

Bennett/Adam/JT,

This is just a template to hold onto in the event we need to file a motion to withdraw the reference.

It would help if you three could focus on the issue of the withdrawal of the reference and if that is appropriate under what we have so far.

The jury trial is another strategic issue – I think Adam's initial reaction was to do request it.

I also think we have to figure out if the District Court will move quickly on this injunction or whether she will move quickly. I have doubts that she will, and want to discuss as a group.

Mathu and Bud tell me that VSI wants to have relief ASAP on several fronts - we need to get that list and make sure we are asking for injunctive relief.

I think they want injunctive relief for - the turnover, the trade secrets, and tortious interference.

## iManage LLC

**Zahralddin, Rafael** has shared a document with you.

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